

Montana Environmental Health Association

January 17, 2013

Representative Mike Cuffe, Chair
 Joint Appropriations Subcommittee on Natural Resources and Transportation
 Montana House of Representatives
 P.O. Box 200400
 Helena, Montana 59620-0400

RE: **LETTER OF SUPPORT-**
 HB2, MDEQ- Subdivision Bureau Funding

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To Joint App. Subcommittee	From MEHA	
Co. Natural Res. & Trans.	Co.	
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Representative Cuffe and Members of the Committee:

The Montana Environmental Health Association (MEHA) is an organization of public health professionals such as Registered Sanitarians, environmental consultants, and other health professionals dedicated to protecting our everyday environment. Critical areas that these professionals work in are MDEQ review of subdivisions and public water systems.

The MEHA association supports the funding of MDEQ Subdivision Program. One of our highest priorities is the protection of the natural environment of Montana and in turn protection of public health. It is important that well reasoned standards that protect the environment and facilitate housing and commercial development are maintained. It is critical that Montanan's have the ability to utilize their own water and wastewater systems in such developments.

The Department of Environmental Quality - Subdivision Review Program has a direct effect on all local County Environmental Health Departments in Montana. The method of review for Sanitation in Subdivisions by counties ranges from acknowledgement of the applications with minimal review to those counties that contract with DEQ for the primary review of sanitation applications. The development of rules and circulars that regulate the sanitation standards for subdivisions is a critical function of the Subdivision Review Program.

The funding method for the Subdivision Review Program is fee based and has proven to be an inadequate method to fund this program. The fee based funding does not adequately address either high or lower levels of sanitation in subdivision activity. Funding a base line budget for the Subdivision Review Program should better serve the residents of Montana by providing consistency in application review, rule development and the support for counties that contract with DEQ.

One of the highest priorities of the development community is consistency of rules and regulations so that they clearly understand how to comply and that timely review procedures can be expected. Funding the Subdivision Review Program with a base line budget will be a significant step in providing a consistent and timely review process- a public expectation. The funding will improve the level of support provided to local counties in administrating these complex rules that apply to sanitation.

We request that the committee support the base line funding of the MDEQ Subdivision Review Program.

Sincerely,

Christine Hughes, R.S.
 Montana Environmental Health Association